



RAMTUC Consignment Issues Working Group (CIWG)			
Chairperson:	M Porter (Sellafield Ltd)	Secretary:	R Brownlow (WEC UK)
Tel No:		Tel No:	01772 762005
Fax No:	01946 780393	Fax No:	01772 762020

MINUTES OF THE 26th RAMTUC CONSIGNMENT ISSUES WORKING GROUP

Date: Tuesday 10th July 2018

Present:

Martin Porter (MP)	Sellafield Ltd - Chairperson
Rachel Brownlow (RB)	WEC UK - Secretary
Gill King (GK)	EdF
Graeme Hewson (GH)	EdF
Kirstie Eden (KE)	Rolls Royce
Vijay Bhatti (VB)	INS
Jonathan Kendrick (JK)	Urenco
Ruth Norbury (RN)	RSRL
Kirsty Barnes (KB)	Sellafield
Marcus Ikin (MI)	Babcock Int Davenport
Kerrie Ross (KR)	Dounreay

1. Apologies

Apologies received from Rachel McNicholas, A Fotheringham, D Evans

2. Chairpersons welcome and comments

MP thanked everyone for attending and introductions were given around the table. MP opened with a security share where he observed communications between people on public transport and relayed how it easy it was for a significant amount of information to be gained regarding where people worked, roles undertaken, what people's opinions were of others in the organisation and also of customers. As this involved SL employees MP did approach the persons and indicated that for security reasons the particular discussion may not be appropriate for a public arena. Much information is provided to personnel to guard against phishing via email and over the phone but we should be aware that this can occur in person also.

In addition KB had a safety share relating to a house fire which started due to the hot sun reflecting off a bedroom mirror causing fabric to catch fire. Again this highlighted the importance of having a working fire alarm in the home, and being aware of potential for fires during this period of hot dry weather.

3. Minutes of the last meeting

The minutes from the last meeting were accepted and will be added to the RAMTUC website.

4. Actions

See appendix 1.1 and 1.2

Action 05/07 GK provided feedback in relation to new DG process, with 5 out of 8 sites reviewed and commitments placed to fill in any gaps, mainly within areas of 'Training' and 'Linked up procedures.

5. Forum Feedback

RAMTUC

MP provided an update of RAMTUC governance issues. The review of RAMTUC membership had occurred and it was concluded that the current policy will be continued where members should be material consignors and will not include freight forwarders / carriers. In addition 4 members were considering taking up director roles within RAMTUC, in replacement for MFlynn who has resigned his post.

Work to look at providing a 'Type W' package was being undertaken in order to allow more flexibility for packaging of certain waste streams above IP2 requirements. A project scope is currently being devised and the team will engage with CIWG to ensure the package will cater for consignors' requirements.

Radsafe, TCSC, NTSF

No feedback available. However It was noted that there had been discussions regarding the oversight of these groups and the links going forward (as they do not fall under SDF).

In addition MP had a question in relation to the RADSAFE manual, how often and what was the process for updating this document as he noted that there were packages within the document which hadn't been used for a period of time.

Action 26.01: G King to raise question regarding the process of update of the RADSAFE manual at next RADSAFE mtg and provide feedback to CIWG.

WNTI

No feedback available.

Regulator Forum Update

A meeting with BEIS is arranged to cover the modified CDG Regulations, this information will be disseminated once available.

RAMCALC / RESCALC

RAMCALC v1.5 is now ready for use, on approval by CIWG/RAMTUC. MP indicated that it would be appropriate to compile a short report summarising aspects such as:

- Reasons behind the need for v1.5
- Changes made to the RAMCALC tool
- The testing and validation exercise that has been undertaken

This could then be submitted to CIWG for approval to allow use of v1.5.

Action 26.02: R McNicholas to submit summary report for status of RAMCALC v 1.5 to allow subsequent use of the tool.

RESCALC – tenders are currently being reviewed and going through a scoring process. A further update should be available at the next meeting.

DGAG / BADGP

A significant point for discussion was related to training in relation to competency based training for those involved in transport issues, for example DGSA, emergency response.

6. LFE

Significant discussion took place in relation to LFE, and this is summarised as follows:

- Packaging – a number of issues relating to using appropriate packages for the material (eg, resistant to corrosives); ensuring packages are filled and secured in compliance with the package approval and associated procedures (eg, with correct seals, bolts etc);
- Importance of holding people to account if there are issues (ie, if a package isn't built up correctly the response should not be to add another layer of supervisor checking as this can drive the wrong behaviours);
- Importance of having clear communication links for contingency planning / emergency arrangements. as otherwise significant time can elapse before the material owner / consignor finds out that an event has occurred. In addition it must be clear who the responsible party / duty holder is in relation to making decisions regarding continuation of a transport.

As a separate note MP gave an update in relation to the legacy chemical issues. In response to the initial findings SL had set up an amnesty such that other legacy chemicals could be brought to a central point from where the treatment / disposal of the chemicals could be controlled and co-ordinated. Unfortunately, this was not undertaken in a strictly controlled manner and thus the central stores now have items that are not labelled and thus the contents are unknown. A programme of working through these items now needs to be undertaken.

MP put out a personal challenge to CIWG members to consider how the LFE information gathered could be put to best use at each of the sites.

7. Operational

Packages/packing issues

RN noted that the first shipment of the new PCM package (Novapak) was due to take place after the previous Type B package became unavailable due to issues during re-licensing. These issues highlighted the importance of retaining appropriate quality / testing records for historic packages as these are being questioned during the re-licensing review.

Urenco noted they had a new package for moving P10 tubes containing UN3507 which comprised a steel drum rather than 4G box.

Carrier issues

There was a question raised relating to RAMTUC Carrier audits – those that had been performed and those programmed going forward. GK noted that an initial round of Carrier audits had been completed and were available for review. A number of members of the group indicated there was some confusion over the plans for carrier audits going forward, how many would be undertaken & by whom etc.

Action 26.01: G King to provide feedback in relation to plans for RAMTUC carrier audits going forward.

8. General topics

ONR Audits/Site Specific Audits

RN noted that they were undertaking audits to look at basic arrangements with some of their non-class 7 contractors, i.e., are they accredited carriers, with appropriate DGSA arrangements for consignment of DG. Initial area worthy of note is in relation to Waste / Hazardous Waste transfers and the variability of degrees of compliance between the different contractors.

KB indicated they had done an audit on SL transport and the findings were available for sharing if required.

SL had an ONR intervention to look at material imports, but noted that this did move into also looking at on-site moves. Hence, the importance of agreeing a scope upfront is important to ensure the appropriate resource is available for the visit.

Emergency exercises

EdF undertook desktop exercise which included involvement from ECC. This was found to be beneficial as they do not often get involved with this desktops. The intention is to repeat a similar style of desktop exercise in the future to involve other members of the emergency response team. EdF are also planning a larger exercise at Hunterston later in the year.

SL noted they had a large exercise planned for ~23rd August involving a full turnout of responders. If anyone wanted to witness this event they should contact MP to arrange.

Rolls Royce have also got an exercise coming up in the next period and will be able to provide feedback at the next meeting.

9. Training

Training/seminars

As a result of a review of the status of Class 7 transport training highlighting a possible vulnerability when John Simpson were to retire, MP has also engaged with National College for Nuclear in relation to the provision of a nuclear transport training curriculum going forward. The 'Training' sub-group has also been engaged and this is something which will be progressed further. MP would provide information regarding any significant updates on this issue.

10. Guidance notes

Nothing further at this meeting

11. AOB

MP indicated that he would be attending a meeting with BEIS and provided with CDG 2019. It was requested that any useful information from the meeting be shared with CIWG.

Action 26.02: M Porter to share feedback from the BEIS mtg relating to CDG 2019

12. Future meeting dates

Approx dates going forward:

Nov 18 – Manchester; Chair – Emma Tallentire

Feb 19 – Birmingham; Chair – Gill King

May 19 – Manchester; Chair – Emma Tallentire

Aug 19 – Birmingham; Chair – Gill King

.

APPENDIX 1.1 MAIN ACTIONS TABLE

Action No	Action	Comments/ Status	Actionee	Target Completion Date
22/09	MG to develop a problem statement in relation to LC5 / NLI requirements in order that a task request can be submitted to RAMTUC legal for provision of a clarification / guidance paper. Action remains on MG to feedback progress from the main RAMTUC mtg. <i>Note: SL have received a note of clarification from ONR which covers aspects of LC5. MP to forward this note to group.</i>	On-going	M Porter	Feedback before NOV mtg
23/01	GK to outline the process EdF use to allow the cross usage of IP and UN rated drums.	On-going	G King	Nov Mtg
23/11	MG to review basis for delivery notification requirement, review forms for commonalities & arrange conference call to agree basis for new form. <i>Action passed to K Barnes to progress</i>	On-going	K Barnes	Nov mtg
24/07	ALL sites to make DGSA Report Exec Summaries available for discussion at next mtg	On going	ALL members	Nov mtg
24/08	RMc to provide feedback as to position of RAMTUC website review and update. <i>Work has been on-going and is undergoing testing.</i> The group requested further feedback as to when it was anticipated the site would be functioning / usable once again	On-going	R McNicholas	May mtg
25/01	Following members to provide feedback from the following forums before each CIWG mtg: RAMTUC main meeting – CIWG Chair TCSC – VBhatti RADSAFE working group – GKing / G Hewson WNTI – CIWG Chair RAMCALC / RESCALC – RNorbury BADGP / DGAG – GKing	On-going	ALL	May mtg
25/02	Forward the ONR-RADSAFE letter for information. <i>Currently undergoing legal review</i>	On-going	M Porter	May mtg
25/03	Provide RAMCALC testing evidence to RMcN.	Complete	A Fotheringham	May mtg

25/04	Provide PCM package status and plan for use going forward New NOVAPAK now introduced for moving PCM (see S7 above)	Complete	A Fotheringham	May mtg
25/05	Provide feedback on the learning from events relating to drum corrosion.	Complete	R Norbury	May mtg
26/01	G King to provide feedback in relation to plans for RAMTUC carrier audits going forward.	New Action	G King	2019

APPENDIX 1.2 NON-CLASS 7 ACTIONS TABLE

Action No	Action	Comments/ Status	Actionee	Target Completion Date
05/07	EDF will share feedback from their dangerous goods self-assessment process	On-going	G King	Feb 18
05/08	ALL to confirm what contractor emergency arrangements are in place for other DG consignments	On-going	ALL MEMBERS	Feb 18

APPENDIX 2

CURRENT STATUS OF GUIDANCE NOTES

Reference & Issue	Title	Author	Status	Review Date
RAMTUC(13)GN06	Dangerous Goods Safety Advisor (DSGA) Annual Report	Alison Fotheringham	Now on Website.	
RAMTUC(13)GN07	Fissile Exceptions Guidance & Flow Chart **	Ceinion Thomas	Transferred to FESG	
RAMTUC(13)GN08	Excepted Matter, Nuclear Liability & Marine Cargo Insurance	Steve Capner (Lead)	No longer required	
RAMTUC(13)GN09	Transfrontier Shipment of Radioactive Waste & Spent Fuel	Alison Fotheringham/ Clare Spour	Approved	
RAMTUC(13)GN10	Placarding – Road/Exclusive Use (based on TCSC 1073)	Steve Capner/Kerrie Ross	Complete	
RAMTUC(13)GN12	Environmentally Hazardous Substances	Steve Capner	This has been published; however, it will now be withdrawn.	
RAMTUC(17)GN15	Placarding – Rail (General & Exclusive Use)	Duncan Chase	Approved –	
RAMTUC	SP 172 and SP 290.	Duncan Chase	Approved	

APPENDIX 3



Radioactive Materials Transport Users Committee
Consignment Issues Working Group (CIWG)
Terms of Reference

PURPOSE:-

To strive to continuously improve the standard of Dangerous Goods Transport with member organisations.

The group will work collaboratively in the field of Dangerous Goods Transport Legislation and relevant Site Licence Conditions with regard to:-

Identification and promulgation of industry best practice at consignor level

Development of common approaches and interpretation, seeking harmonisation

Identify training requirements and issues for dissemination to the training working group

Consolidation and consideration of intelligence from other industry sources and working groups

Sharing and retention of knowledge including DGSA reports, operational experience and lessons learned from exercises, incident/events, non-conformances and audits

Production of LFE table from all RAMTUC organisation members and annual trending associated with LFE

Ownership/maintenance of RAMCALC

Reporting back and issues from RAMTUC and feeding down any issues arising at RAMTUC of interest to consignors

Adopted 14th November 2012